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PATENT

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re application of : K. Scott Ramey, et al.  
Serial No. : 10/662,603  
Filed : September 15, 2003  
For : METHOD, APPARATUS, AND ARTICLE  
OF MANUFACTURE FOR WEB-BASED CONTROL OF A  
CALL SERVER  
Group No. : 2194  
Examiner : Charles E. Anya  
Confirmation No. : 2370

**MAIL STOP APPEAL BRIEF - PATENTS**

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**APPELLANT'S REPLY BRIEF**

In response to the Examiner's Answer mailed March 18, 2011, this Reply Brief is submitted for the application identified above. Please charge any necessary fees to Nortel Networks Deposit Account No. 14-1315.

In one aspect, Appellant's appeal brief questioned the identification of which component in Szlam teaches the claimed "wrapper." In response, the Answer clarified that Szlam's controller 225 is deemed to be the claimed "wrapper." Appellant appreciates this further clarification by the Examiner.

The Examiner's Answer (page 18) also appears to misconstrue Appellant's argument regarding the teachings of Echols. Appellant's argument is not limited to arguing that "(2) Echols does not teach a web application that provides web application commands that are translated into caller system format." Instead, Appellant argues (1) Echols' operator work station 11 is not equivalent to Appellant's web application at a web server, and (2) the "web application" is not accessed from the web server. Further, it is apparent from page 19 of the Answer (and as argued in Appellant's brief, pp 18-19) that Echols is merely utilized by the Office to show there exists a communication channel between Echols' work station 11 (with a web browser) and a web server 21. This is insufficient to provide the required teaching or suggestion to combine the understood teachings of the Echols' reference with Szlam.

The Office takes the position that a "web browser" within the work station 11 meets the claimed "web application" and Echols' web server 21 is equivalent to Appellant's claimed "call server." (Answer, page 19). Appellant disagrees that Echols' operator work station 11 is or can be equivalent to a "web server" or that Echols' web browser operating within the work station 11 is "accessed from a web server." Echols clearly describes a typical communication scenario in which a web browser in the work station 11 utilizes URLs to access web pages from the web server 21

connected to the network. Echols, Col. 2, line 48 to Col. 3, line 23. Based on Appellant's understanding of Echols, it does not appear that Echols refers to, or equates, the operator call station 11 as a "web server" or the web browser within the call station 11 as being accessed from a "web server." A reasonable assessment of what constitutes a "web server" would conclude, at a minimum, that a web server would require server software to be installed therein. However, a web browser is NOT server software, and Echols does not appear to describe the operator work station 11 as including server software. Accordingly, one skilled in the art would not construe a computer with a web browser to equate to a "web server."

Clearly, the web browser is "accessed" by the operator sitting at the work station 11 – and not by the web server 21 ("the operator makes a request which is interpreted by the visual web browser software in work station 11, and is sent to the web server 21" see, Col. 3, lines 8-10). As a result, Echols does not teach the specific configuration of a web application at a web server, with the web application being accessed through the web server, to allow call control commands to be sent from the web application (at the web server) in web application format to the wrapper which translates the call control commands and sends them to the call server system in call server format.

**CONCLUSION**

The Appellant has demonstrated that the present invention as claimed is clearly distinguishable over the prior art cited of record. Therefore, the Appellant respectfully requests that the Board of Patent Appeals and Interferences reverse the final rejection of the Examiner and instruct the Examiner to issue a notice of allowance of all claims.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Nortel Networks Deposit Account No. 14-1315.

Respectfully submitted,

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